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June 26, 1998

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**EX PARTE PRESENTATION**

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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

JUN 26 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121*

Dear Ms. Salas:

Enclosed is SBC Communications' June 1998 report regarding its success in opening its local markets. SBC provides this report on a monthly basis to Commission staff in an effort to keep it informed about the market opening activities of SBC's telephone operating companies. The report demonstrates that SBC's operating companies have made available products, services, and systems required by Section 251 and the competitive checklist of the 1996 Act and, furthermore, that competitive local exchange carriers (CLECs) have ordered and are actually using each of the 14 checklist services and products to provide local service in all of SBC's seven states. For example, SBC has lost over one million lines to CLECs in its region. *SBC is the first incumbent local exchange carrier in the Nation to lose over one million lines to competitors.*

Should you have any questions concerning the report, do not hesitate to contact me. In accordance with the Commission's rules, an original and two copies are submitted herewith.

Very truly yours,

*Todd F. Silbergeld*

Enclosure

cc: Mr. T. Power  
Mr. J. Casserly  
Mr. P. Gallant  
Ms. A. Wright

Mr. K. Dixon  
Mr. K. Martin  
Ms. K. Brown

Mr. R. Welch  
Ms. C. Matthey  
Mr. M. Pryor

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## **SBC'S SUCCESS IN OPENING ITS LOCAL MARKETS AND COMPLYING WITH THE 1996 TELECOMMUNICATIONS ACT**

### **June 1998 Report**

SBC has dedicated significant resources and investment to open its markets to local competition and to comply with all requirements contained in the 1996 Telecommunications Act. As described in detail below and demonstrated in the attached checklist provisioning status report, SBC's local exchange companies (Southwestern Bell Telephone, Pacific Bell and Nevada Bell) have made available products, services and systems required by Section 251 and the competitive checklist of the 1996 Act, and competitive local exchange carriers ("CLECs") have ordered and are actually using each of the 14 competitive checklist services and products to provide local service in all seven SBC states.

There is irrefutable evidence that new entrants are obtaining the network elements that they need from SBC to provide local service, that they are providing such exchange services to end users and that their ability to enter the market is unambiguous. Taken together, these data demonstrate that barriers to entry into the local market in SBC's states have been eliminated, that competitive entry is occurring, that all 14 checklist items are legally and practically available to CLECs that want them and that SBC has lost more than **one million** lines to CLECs in SBC's states. Of these **1,072,600** lines lost, approximately **631,000** were resale lines and **441,000** lines were captured by facilities-based carriers. **In May, 1998, SBC became the first RBOC or LEC in the country to lose more than one million access lines to CLECs.** These lost lines, moreover, represent a disproportionate revenue loss since the major long distance carriers and CLECs have publicly acknowledged that they have targeted the more profitable "high value" heavy users. As a result of SBC's compliance efforts, CLECs now have everything they need to compete against SBC and can use resale, interconnection or unbundled network elements to compete for and take SBC customers.

In the face of undeniable market facts, it is no longer plausible for competitors and regulators to continue to deny that SBC has opened its markets to local competition and made available each of the statutorily required 14 point checklist items. The numbers are clear and irrefutable. For example in the past 2 years, not only has SBC lost approximately one million lines to CLECs, but:

- SBC has also signed 366 interconnection agreements with competitors and 260 of these agreements have been approved by state PUCs
- 218 CLECs are operational and have passed local orders to SBC
- More than 110 CLECs are using SBC's Directory Assistance and Call Completion Services
- More than 2 million CLEC service orders have been processed without a backlog
- 450,000 CLEC customers are listed in SBC's White Pages
- More than 310,000 trunks have been provisioned to CLECs
- 75,000 lines have been converted to CLECs via interim number portability
- 54,000 unbundled loops have been provisioned
- 412 operational physical collocation cages have been provided to CLECs
- 21 million telephone numbers have been provided to CLECs for facilities-based use
- More than 12 billion minutes of local and Internet traffic have been exchanged between SBC and CLEC networks

Moreover, SBC has developed and implemented more than 65 performance measurements in each of its seven states covering all aspects of its relationships with CLECs. These measurements mirror precisely the model performance measurements advocated by the U.S.

Department of Justice. The results generated from these measurements clearly demonstrate that SBC is providing CLECs with checklist items in substantially the same time and manner that it providing such services to itself. Thus, the IXCs' and CLECs' argument that SBC has not sufficiently opened its markets to competition and lost the required number of local customers is an intentional mischaracterization of the Act, as conceded by the DOJ and the FCC. Both of these agencies acknowledge that there is no market share loss or metric test required by the Act. The only statutorily required test is embodied in the competitive checklist with which SBC has fully complied.

In light of these market facts, it is becoming obvious that the isolated, anecdotal, outdated and unrepresentative complaints raised by the major long distance carriers are disingenuous and have less to do with whether SBC has actually made available specific checklist items in an appropriate manner and more to do with protecting their long distance market shares and profits from the increased competition that would result from SBC entering that market. Moreover, isolated and anecdotal complaints raised by other CLECs must also be put in context since it is in their self-interest to delay SBC's entry into the long distance market for as long as possible so that they can continue to use the 271 process as leverage to obtain additional advantages from regulators and to target and offer one-stop shopping to high profit business customers while SBC is denied the ability to offer comparable full-service bundles of services to business and residential customers. SBC is not perfect and it is continuing to make improvements in its procedures and systems, but the Congress, the DOJ and FCC have made it clear that perfection is not required to meet the competitive checklist test.

#### **SBC's Capital and Expense Investments To Open Its Markets**

- Since the passage of the 1996 Act on February 6, 1996, SBC has devoted significant financial, technical and personnel resources to implement the market- and network-opening requirements of Sections 251 and 252 of the Act. SBC management and employees have made extraordinary efforts to open SBC's networks to competitors. SBC has incurred more than \$1 billion in expense and capital expenditures and devoted more than 3,300 employees to implement the Act and open its local markets to competition – including but not limited to operational support systems, number portability, trunking, local service centers, equipment, computer hardware, software and manpower. Of these expenditures, Pacific Bell and Nevada Bell have spent more than \$620 million and SWBT has expended more than \$400 million. By the end of 1998, SBC estimates that it will have spent a total of \$1.5 billion making certain it meets the requirements of the Act.

#### **Interconnection Agreements**

- **Signed Agreements:** SBC and CLECs have signed 366 interconnection and resale agreements within SBC's seven-state service area. In addition, 492 CLECs have received PUC approved certificates to provide local service in SBC states. The good faith associated with SBC's negotiation of interconnection agreements with CLECs is illustrated by the fact that the parties voluntarily consummated 366 agreements and only 26 arbitrations were required.
- **PUC Approved Agreements:** The various state commissions have approved 260 SBC-CLEC interconnection and resale agreements. These approved agreements give the CLECs everything they say they need to provide local services and compete against SBC. There are a large number of PUC approved agreements in each of SBC's states: Texas: 118; California: 28; Kansas: 27; Arkansas: 29; Oklahoma: 18; Missouri: 28 and Nevada: 12 approved agreements.

- **Current Negotiations:** SBC currently is in the process of negotiating more than 500 additional interconnection, resale and combination interconnection agreements.

### **CLECs Competing Against SBC**

- As of the end of May 1998, more than 218 CLECs were operational in SBC's territory and passing resale, interconnection or UNE orders to SBC. 101 CLECs were passing orders in Texas alone.

### **SBC Access Lines Lost to CLECs**

- Through the end of May 1998, more than **one million** access lines have been lost to CLECs through resale or through the establishment of new facilities-based service by CLECs in SBC's seven-state service area. Approximately 631,500 SBC lines have been resold by CLECs and approximately 441,000 additional customers are being served on a facilities-basis (as indicated by CLEC E-911 listings) by CLECs in SBC's territory.

The approximate number of lines lost to CLECs in SBC's 7 states on a resale and facilities-basis is:

	Resale Total	Resale Residential	Resale Business	Resale Priv. Coin	Facilities Based Lines	Total Lines Lost
a) California:	254,000	133,300	112,000	8,600	381,500	635,000
b) Texas:	275,000	195,000	68,800	11,000	30,500	305,000
c) Kansas:	46,700	22,000	24,800	0	1,400	48,100
d) Oklahoma:	19,500	15,600	3,900	25	14,200	33,700
e) Arkansas:	14,200	12,900	1,300	0	10,300	24,500
f) Missouri:	20,300	12,300	7,900	50	3,000	23,300
g) Nevada:	1,800	344	1,400	0	N/A	1,800
<b>RESOLD LINES:</b>	<b>631,500</b>	<b>391,500</b>	<b>220,000</b>	<b>19,800</b>		
<b>FACIL.-BASED LINES LOST:</b>					<b>441,000</b>	
<b>SBC TOTAL LINES LOST:</b>						<b>1,072,600</b>

### **SBC has made Resale available**

- Given that CLECs now resell more than 631,000 lines in SBC's territory, there can be no dispute that resale of local service is available and significant in SBC's territory. SBC has demonstrated that it has made resale available and that its OSS can process CLEC resale orders in an accurate and timely manner without any backlogs. For example, in the last four months of 1997 (before AT&T and MCI unilaterally decided to abandon residential resale competition), SBC processed an average of 60,000 resale orders in each of these four months without a backlog. These numbers confirm that SBC has developed state-of-the art operational OSS that can handle large volumes of CLEC resale orders in an accurate, timely and non-discriminatory manner.

- Resale activity slowed from March through May, 1998 as AT&T and MCI continued their efforts to redline the resale and residential markets in California and Texas. In fact, residential resale lines in California actually declined for those three months primarily as a result of publicly acknowledged decisions by AT&T and MCI to stop signing up new residential resale customers in California and apparently encouraging existing resale customers to switch to other carriers. For example, in May, resold lines in California declined by more than 3,300 lines compared to a gain of more than 20,000 resold lines in December 1997 and resold lines in Southwestern Bell's states increased by only 12,500 resold lines in May compared to a gain of approximately 40,000 lines in October 1997. Nevertheless, even if the major IXCs chose for their own strategic, internal business and regulatory reasons not to take advantage of the resale option made available to them by SBC because they do not like the resale pricing discounts required by the 1996 Act and approved by the PUCs, there can be no dispute that SBC has met its obligations under the Act to make resale available to competitors. The figures listed above demonstrate that SBC has made available to CLECs all the systems and services they need to compete on a resale basis in each of SBC's states.

#### **FACILITIES-BASED COMPETITION STATUS:**

Facilities-based competition in SBC's states is substantial and has increased dramatically in recent months. CLECs are serving more than **440,000 lines on a facilities-basis** in SBC's territory. The following market facts demonstrate that SBC has opened its local markets to competition and that in addition to making resale available to competitors, SBC is also providing CLECs with the facilities and network elements they need from SBC in order to compete on a facilities-basis in the local exchange market. Information is not available to SBC to identify with precision the full extent of facilities-based competition in each of its states. Available indicators underestimate the extent of facilities-based competition and are imperfect measures of competitive entry because each captures only that part of entry that requires action by SBC and does not capture the extent of facilities-based self-supply being undertaken by CLECs. Nevertheless, a review of available indicators (e.g. CLEC E-911 listings and numbers ported) demonstrate that there is significant and growing facilities-based competition in SBC's states and that approximately **441,100 lines** are being served on a facilities-basis by CLECs in SBC's states.

- SBC is making available to CLECs through 260 PUC-approved interconnection agreements and its new and modified systems and networks, all products, services and systems that CLECs need to provide facilities-based or UNE-based local service to residential and business customers.

#### **CLEC E-911 Numbers—Best Indicator of Facilities-Based Competition**

- CLEC listings in the E-911 database is the best available indicator of access lines being served on a facilities basis by facilities-based carriers. These listings show that CLECs serve approximately 441,100 lines in SBC's 7 states on a facilities-basis. Specifically, CLECs have requested E-911 service for 441,100 lines from their own NXX Codes that were assigned to them to provide facilities-based service.
- In California alone, 14 facilities-based carriers serve approximately 381,000 lines on a facilities basis (based on E-911 listings). CLEC E-911 listings indicate that there is at least the following number of lines being served on a facilities-basis in the other SBC states: Texas: 30,500; Oklahoma: 14,200; Arkansas: 10,300; Missouri: 2,950; and Kansas: 1,470 facilities-based lines.

### **Numbers Ported—Second Indicator of Facilities-Based Competition**

- More than 75,400 existing SBC lines have been ported via interim number portability to facilities-based competitors in each of SBC's seven states. CLECs have chosen to port mostly business lines, but the same basic processes and procedures can be used to port residential lines. This is one indicator of facilities-based competition that has occurred in SBC's seven states, but it underestimates the actual amount of facilities-based competition that has occurred. Each of the numbers ported represents conversion of an existing line from SBC to a facilities-based CLEC provider. It should be noted, however, that lines do not have to be ported when CLECs serve new lines/customers on a facilities-basis.

### **Minutes Exchanged – Another Indicator That SBC's Networks Are Open**

- The fact that more than **12 billion** minutes of local and internet traffic has been exchanged between SBC and CLEC networks is compelling evidence that SBC has opened its networks and has met the competitive checklist. Reciprocal compensation minutes of use is an indicator that demonstrates that actual local traffic is being exchanged between CLECs and SBC. A substantial amount of local traffic has been exchanged between SBC and CLECs, with most of that traffic (and the corresponding reciprocal compensation) going from SBC to the CLECs. For example, approximately **4.1 billion** minutes of local traffic (excluding Internet traffic) has been exchanged between SWBT/Pacific Bell/Nevada Bell and CLECs over interconnection trunks. More than 80% of this local traffic has been exchanged from SBC to CLEC networks. It should be noted, that these minutes do not capture all local minutes being generated by CLECs because they do not include CLEC-to-CLEC traffic or on-net (i.e., intra-CLEC) traffic.
- In addition, the fact that an additional **8.3 billion** minutes of Internet traffic has been exchanged between SBC and CLEC networks also demonstrates that SBC's networks have been opened to competition. The **12 billion** minutes of local and Internet minutes-of-use exchanged between SBC and CLEC Networks confirm that SBC's networks are open to and connect with CLEC networks.

### **UNEs, Interconnection and Other Facilities-Based Products Provided By SBC to CLECs**

- **Interconnection Trunks**: SBC's provisioning of local interconnection trunks is an indicator that the interconnection checklist requirement has been met and that actual local exchange traffic is being exchanged between CLECs and SBC. SBC has provisioned approximately **313,000** one-and two-way interconnection trunks to CLECs in SBC's seven-state service area. These trunks allow CLECs to connect their networks and customers to SBC's network. The following number of trunks were provided by SBC to CLECs: California: 196,000 trunks; Texas: 86,000; Oklahoma: 9,700; Missouri: 10,700; Arkansas: 5,400; Kansas: 3,000; and Nevada: 2,000 trunks.
- **Unbundled Loops**: Unbundled loops are the direct connection between the local network and customer's premises. CLECs can provision loops themselves, or they can lease unbundled loops from SBC or other suppliers. Because CLECs can self-provision loops, the number of unbundled loops provided by SBC understates the extent of existing facilities-based competition. Nevertheless, approximately **54,000** unbundled loops have been provisioned by SBC to CLECs in SBC's seven states. In addition, more than 390 unbundled switch ports have been requested by and provided to CLECs by SBC.

- **CLEC Collocation Arrangements:** Collocation is an important measure of competitive facilities-based presence because once a competitor is collocated in an SBC central office it has access to every loop connected to that central office. 412 physical collocation arrangements are operational in SBC's seven-state service area -- 90 of these are in SWBT's region, with 319 in California.
- 436 physical collocation arrangements (161 in SWBT and 275 in California/Nevada) are currently being worked on and pending completion.
- More than 55 virtual collocation arrangements are operational in SWBT's five-state territory.
- **E-911 Trunks:** CLECs have requested and SBC has provisioned 697 operational E-911 trunks to facilities-based CLECs in SBC's seven-state service area. Of this number, 460 are located in California and 231 are in SWBT states.
- **DA/OS Trunks:** More than 880 Directory/Operator Assistance trunks have been provisioned by SWBT to CLECs in the five SWBT states. More than 110 CLECs are using SWBT's Directory Assistance and "O" Call Completion services.

#### **Telephone Numbers Requested By and Assigned to CLECs**

- More than 2,169 NXX codes (each code representing 10,000 numbers) have been assigned to facilities-based CLECs in SBC's seven-state service area, with an additional 284 assignments pending. In other words, CLECs have requested and SBC has assigned 21.6 million telephone numbers to CLECs in its seven states; more than 12.6 million numbers have been requested by CLECs in California and an additional 8.9 million numbers have been requested in SWBT's five states.

#### **Access to SBC White Page Directories**

- CLEC information can be included in all SBC White Page directories in SBC's seven state service areas. SBC has provided more than 450,000 white page listings for CLEC customers. Of these listings, 260,000 have been in SWBT states and 189,000 in California.

#### **Access to SBC Poles and Conduits**

- SBC has provided competitors with access to more than 373,000 of its poles and approximately 8.2 million feet of conduit space for their use to compete against SBC in its seven states.

#### **CLEC Orders Handled by SBC's OSS and Local Service Centers**

- Since the 1996 Act passed, SBC's OSS and Local Service Center personnel have handled more than 2 million service orders from CLECs to order facilities, network elements and resold or second lines for their customers, change or add vertical services etc. More than 1.3 million orders from CLECs have been processed in the SWBT five-state region and more than 733,000 orders have been processed in California/Nevada. The fact that SWBT processed more than 730,000 orders in 1997, and an additional 573,000 orders in the first five months of 1998, without a backlog, is strong evidence that SBC has developed state-of-the-art OSS and that these systems are being used by CLECs to compete in the local market against SWBT. Orders are also being processed in California in a similar timely and accurate manner without any backlogs.

- SBC also demonstrated in Texas that its OSS (which is the same system used in all five SWBT states) could handle large increases in volumes from CLECs. Over **one million** CLEC service orders in Texas have been processed, with over 414,000 orders processed in January through May of 1998. SBC's OSS and Local Service Centers have handled the increased volume of service orders without experiencing a backlog.

### **Performance Measurements**

- SBC has also developed and implemented more than 65 performance measurements that cover all aspects of its relationships with CLECs in all seven SBC states. These measurements mirror and fully comply with the model set of measurements advocated by the U.S. Department of Justice. SBC's performance measurements cover each of the five recognized OSS functions (i.e., preordering, ordering, provisioning, maintenance and repair, and billing).
- The results generated by these performance measurements compare SBC and CLEC performance for each of the measurements and these results confirm that SBC is providing each of the 14 competitive checklist items in substantially the same time and manner that is it providing such services to itself. The results from these valid and statistically significant measurements also demonstrate that many of the complaints being raised by the IXC's and CLECs are isolated, anecdotal, outdated and unrepresentative.

### **Conclusion**

- The resale, interconnection, facilities-based and OSS-related numbers listed above, provide compelling evidence that SBC has opened each of its seven states to resale, facilities-based and UNE competition and that SBC provides CLECs with all the systems and services they need to capture SBC's local customers.
- A neutral examination of the record unequivocally confirms that SBC has lost more than one million lines to CLECs, it has complied with the 1996 Act, it has provided CLECs with access to all 14 competitive checklist items and it has opened its local markets to competition.
- IXCs and CLECs who have chosen to redline the local residential market and who have made a strategic decision not to invest or compete in SBC's local markets are doing so for their own economic, regulatory and public relations reasons, not because they are unable to obtain competitive checklist products and services from SBC. Blame for their targeting of more profitable customers and their unwillingness to compete in the less profitable residential local market on a resale or facilities-basis cannot be laid at the feet of SBC. CLECs who do want to compete on either a resale or facilities-basis in SBC's territory for business or residential customers can provide and are, in fact, already providing such local services in direct competition with SBC.

**SBC's Section 251 / Checklist Provisioning Status**

Data through: 5/98 (unless otherwise noted)

Date Produced: 6/20/98

Shaded data through 4/98 (unless otherwise noted)

Green, italicized, bolded data is corrected from previous edition.

#	CHECKLIST DESCRIPTION	PRODUCTS PROVIDED	AR	KS	MO	OK	TX	SWBT's 5 States	CA	NV	SBC TOTAL
1	Interconnection for the transmission and routing of telephone exchange service and exchange access at any technically feasible point within the carrier's network.	<b>Total Trunks Trunks Provided to CLECs</b> · One Way Trunks (SBC to CLEC) · One Way Trunks (CLEC to SBC) · Two Way Trunks <b>Physical Collocation *</b> · Operational Cages · Pending Cages <b>Virtual Collocation *</b> · Operational Arrangements · Pending Arrangements <b>Number of Collocated Wire Centers</b>	5,446 4,016 572 858 6 5 2 0 3	3,004 1,416 400 1,188 4 6 6 0 5	10,769 5,141 1,893 3,735 9 30 8 0 9	9,728 7,401 1,487 840 15 7 5 0 13	86,047 49,263 18,982 17,802 56 113 35 5 39	114,994 67,237 23,334 24,423 90 161 56 5 69	196,291 13,586 1,680 181,025 319 274 0 1 111	2,160 0 0 2,160 3 1 0 0 3	313,445 80,823 25,014 207,608 412 436 56 6 183
2	Nondiscriminatory access to network elements. (In addition, See Items 3-6 below)	<b>Number of CLECs passing orders in 1998</b> <b>Total orders processed (2/6/96 - 5/98) **</b> · Manual · Electronic <b>Total orders processed in 1997 **</b> · Manual · Electronic <b>Total orders processed in 1998 **</b> · Manual · Electronic <b>Total orders processed in May 1998 **</b> · Manual · Electronic	15 55,933 53,627 2,306 19,035 19,035 0 36,898 34,592 2,306 6,414 5,658 756	16 88,267 58,008 30,259 41,476 28,972 12,504 46,791 29,036 17,755 10,449 6,310 4,139	21 37,446 23,961 13,485 6,396 6,309 87 31,046 17,648 13,398 8,562 4,010 4,552	15 67,354 61,832 5,522 22,832 20,408 2,424 44,518 41,420 3,098 8,663 8,106 557	101 1,097,155 848,722 248,433 641,098 495,077 146,021 414,453 312,041 102,412 80,666 62,687 17,979	168 1,346,155 1,046,150 300,005 730,837 569,801 161,036 573,706 434,737 138,969 114,754 86,771 27,983	46 733,494 100% in 1996 0% in 1996 491,327 ~ 80% ~ 20% 172,970 54,507 118,463 39,958 15,983 23,975	4 5,569 5,569 0 3,511 3,511 0 2,058 2,058 0 489 489 0	218 2,085,218   1,225,675   748,734   155,201   373,750
3	Nondiscriminatory access to poles, ducts, conduits and rights of way.	<b>Total Number of Poles Attached (Note 1)</b> <b>Total Feet of Duct Occupied (Note 1)</b>	166 188,922	56 13,214	415 67,092	186 87,621	2,358 621,579	3,182 978,428	370,060 7,236,650	508 16,225	373,750 8,231,303
4	Local loop transmission from the central office to the customer's premises, unbundled from local switching or other services.	<b>Unbundled Loops</b>	845	342	1,319	1,197	376	4,079	47,311	3,280	54,670
5	Local transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services.	<b>Unbundled Transport</b> · Dedicated Transport Available? · Shared Transport Available?	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes
6	Local switching unbundled from transport, local loop transmission or other services.	<b>Unbundled Switch Ports</b>	0	0	0	0	235	235	161	0	396
7	Nondiscriminatory access to 911 and E911, directory assistance, and operator call completion services.	· E911 Trunks (not included in Item 1 Total) · DA/OA Trunks (not included in Item 1 Total) *** · CLECs using Directory Assistance Service (Note 2) · CLECs using "0" Call Completion Service (Note 2) · Are CLECs offered E-911 service directly to government bodies or interconnecting with SBC's existing service arrangements? <b>Number of Facilities Based CLEC End User E-911 Listings (MOKA a/o 6/10/98)</b> · Residence · Business · Total	18 64 9 9 Yes 592 9,770 10,362	24 0 12 12 Yes 4 1,467 1,471	18 84 16 16 Yes 12 2,947 2,959	20 85 10 10 Yes 188 14,090 14,278	153 632 101 97 Yes 3,498 27,000 30,498	231 865 117 113 Yes 4,294 55,274 59,568	460 0 Data Not Available Data Not Available Yes Res/Bus Split Not Available 381,564	6 18 Data Not Available Data Not Available Yes Data Not Available Available 0	697 883   Yes 4,294 55,274 441,132
8	White pages directory listing for customers of other carrier's telephone exchange service.	<b>Number of CLEC End User White Pages Listings</b> · Resale · Facilities Based · Total	12,761 444 13,205	30,314 185 30,499	14,430 816 15,046	16,354 856 17,210	180,853 3,001 183,854	254,712 5,102 259,814	175,324 13,650 188,974	600 888 1,488	430,636 19,640 450,276

# SBC's Section 251 / Checklist Provisioning Status

Date Produced: 6/20/98

☐ Data through: 5/98 (unless otherwise noted)  
☐ Shaded data through 4/98 (unless otherwise noted)

Green, italicized, bolded data is corrected from previous edition.

#	CHECKLIST DESCRIPTION	PRODUCTS PROVIDED	AR	KS	MO	OK	TX	SWBT's 5 States	CA	NV	SBC TOTAL
9	Nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers.	Telephone Numbers Provided to CLECs (Note 3) · Numbers Assigned · Numbers Pending Assignment	140,000 0	80,000 0	960,000 0	330,000 0	7,460,000 190,000	8,970,000 190,000	12,690,000 94,000	30,000 0	21,690,000 284,000
10	Nondiscriminatory access to databases and associated signaling necessary for call routing and completion.	Access to 800, Line Information Database (LIDB), Calling Name Delivery Database (CNAM), and SS7 Signaling Network Available?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
11	Interim number portability through RCF or DID trunks. Each line ported represents conversion of an existing line from SBC to a facilities-based provider.	Numbers Ported to CLECs via INP · Residential Lines · Business Lines **** · Total	5 2,035 2,040	0 821 821	0 1,581 1,581	0 10,419 10,419	50 22,705 22,755	55 37,561 37,616	0 31,786 31,786	0 6,006 6,006	55 75,353 75,408
12	Nondiscriminatory access to services and information required to allow implementation of dialing parity.	Are additional access codes or digits needed to complete local calls to or from CLEC customers? IntraLATA toll dialing parity available concurrent with SBC's provision of interexchange service?	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes
13	Reciprocal compensation arrangements. (Note 4) *****	Local and EAS Minutes of Use Exchanged Over Interconnection Trunks Since 1/1/97 (in Millions) · From SBC to CLEC · From CLEC to SBC (CA - does not incl. Jan-98) · Total  Local and EAS Minutes of Use Exchanged Over Interconnection Trunks in April 1998 (in Millions) · From SBC to CLEC · From CLEC to SBC · Total  Local and EAS Minutes of Use Exchanged Over Interconnection Trunks in May 1998 (in Millions) · From SBC to CLEC · From CLEC to SBC · Total	26.8 6.7  33.5	0.4 0.0  0.4	33.6 0.3  33.9	133.9 12.4  146.3	242.9 241.2  484.1	437.6 260.6  698.2	2,901.7 518.5  3,420.2	22.1 0.0  22.1	3,361.4 779.1  4,140.5
14	Offering for resale at wholesale prices any telecommunications services offered at retail to subscribers who are not themselves carriers.	Resold Access Lines · Business Lines (Simple and Complex) · Private Coin Lines · Residential Lines · Total	1,300 0 12,910 14,210	24,800 0 21,953 46,753	7,960 50 12,377 20,387	3,890 25 15,647 19,562	68,861 11,080 194,989 274,930	106,811 11,155 257,876 375,842	111,914 8,686 133,347 253,947	1,447 0 344 1,791	220,172 19,841 391,567 631,580

Note 1: CA and NV data updated quarterly. CA Total Feet of Duct Occupied reflects both IXC and CLEC facilities.

Note 2: SWBT total counts each CLEC once, although it may appear in multiple states and as both a facilities based and resale provider.

Note 3: Each NXX Code equals 10,000 telephone numbers.

Note 4: Totals do not include disputed Internet minutes of use. However, the fact that over 8.29B minutes of Internet traffic have been exchanged between SBC and CLEC networks in 1997 and 1998 also demonstrates that SBC's networks have been opened to competition. SWBT 1997 and 1998 totals include only Local and Optional EAS traffic. PB 1997 totals also include intralATA toll.

\* CA reflects actual number of cages. By SWBT methodology, operational physical collocation would be 233 (counting CLECs in a given wire center only once).

\*\* CA Order Volumes include resale activity only (not facilities based orders).

\*\*\* KS does have OA/DA trunks, but they appear in MO as they serve both MO and KS.

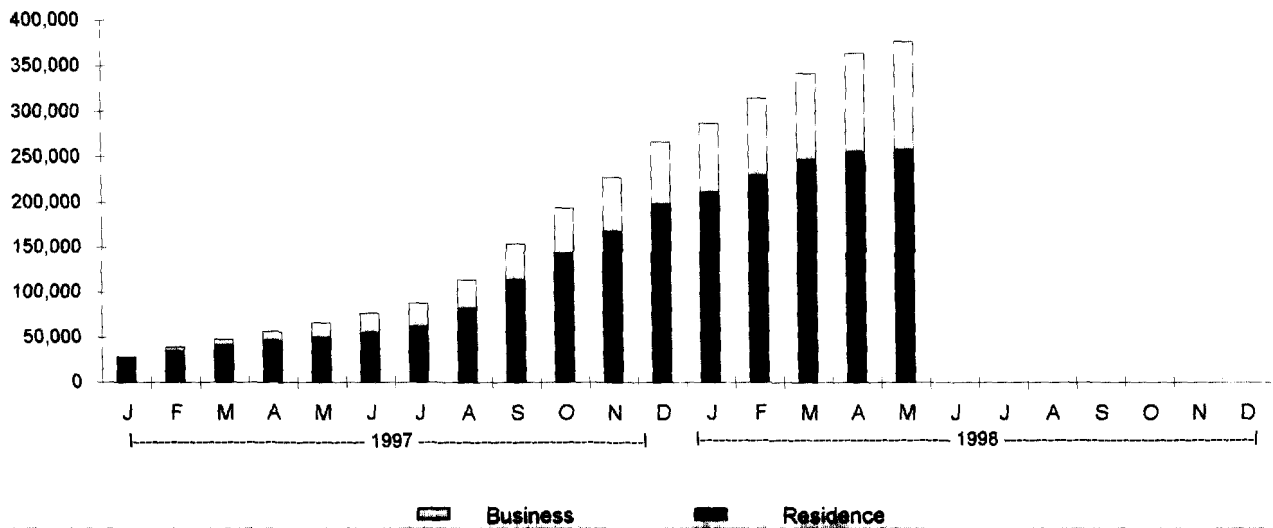
\*\*\*\* NV number fell by approx. 3000 due to billing database error. Being resolved.

\*\*\*\*\* Represents only that traffic for which originating records have been exchanged.

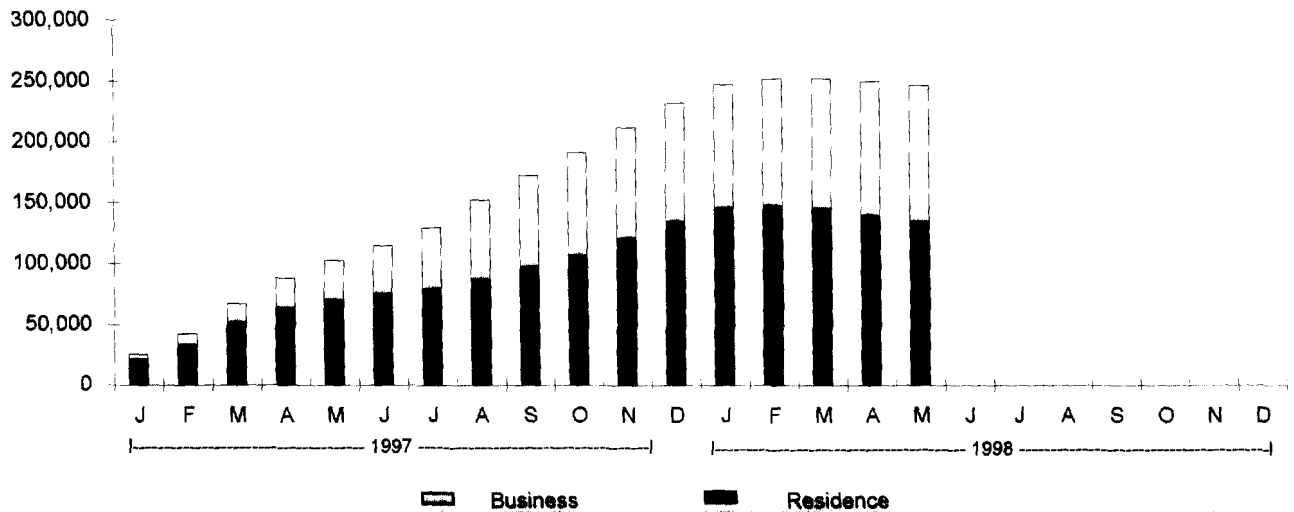
CLECs with Certifications (a/o 6/12/98)	AR	KS	MO	OK	TX	SWBT's 5 States	CA	NV	SBC TOTAL
Number Approved	21	52	40	38	164	315	117	60	492
Number Pending	23	3	15	15	9	65	29	2	96
CLEC Interconnection Agreements (a/o 6/19/98)									
Number Signed (Resale, FB, & Combo)	38	43	48	42	146	317	35	14	366
Number Approved (Resale, FB, & Combo)	29	27	28	18	118	220	28	12	260
Number of Arbitrations Completed	1	3	3	1	11	19	4	0	23
Number of Arbitrations In Progress	1	0	0	0	1	2	0	1	3
Number Under Negotiation (Resale, FB, & Combo)	65	64	77	71	141	418	59	38	515

# SBC Resold Lines - Cumulative Resale Lines Lost to CLECs

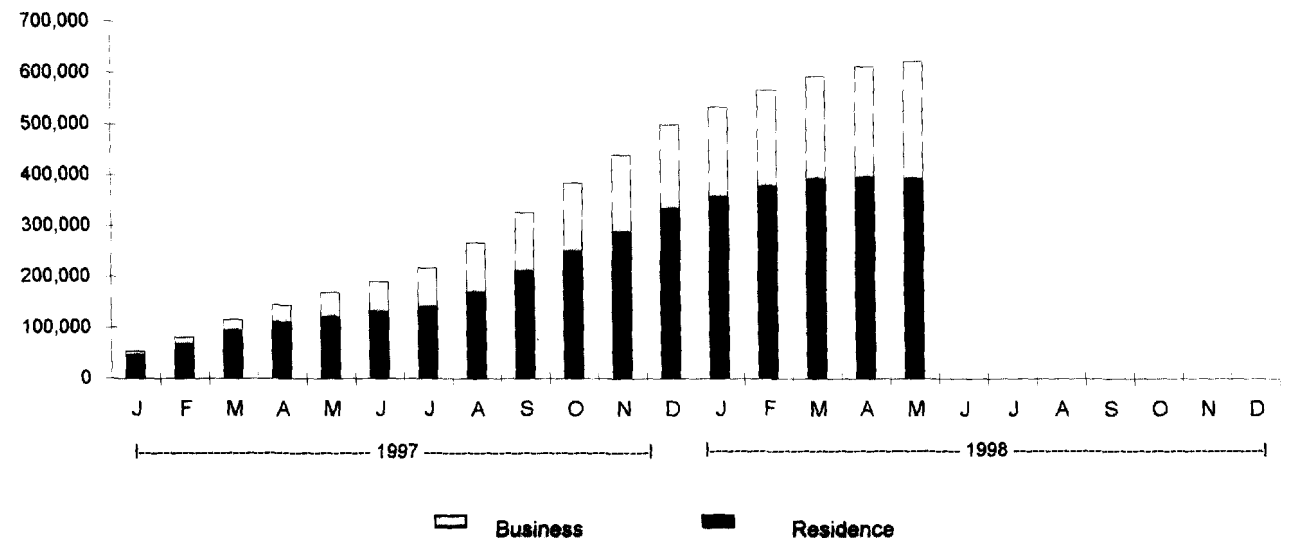
Southwestern Bell Telephone



Pacific Bell

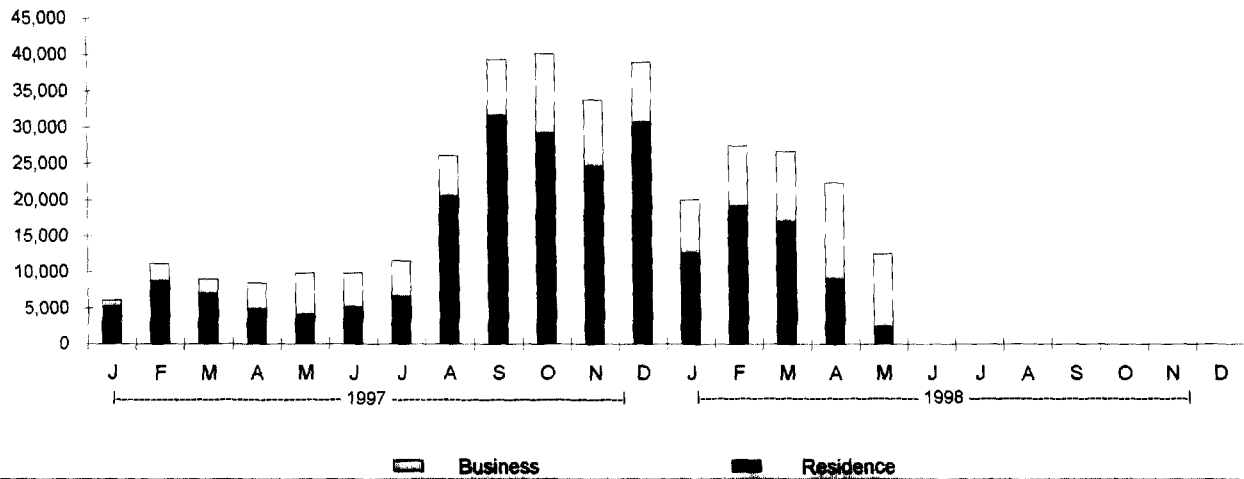


SBC Consolidated

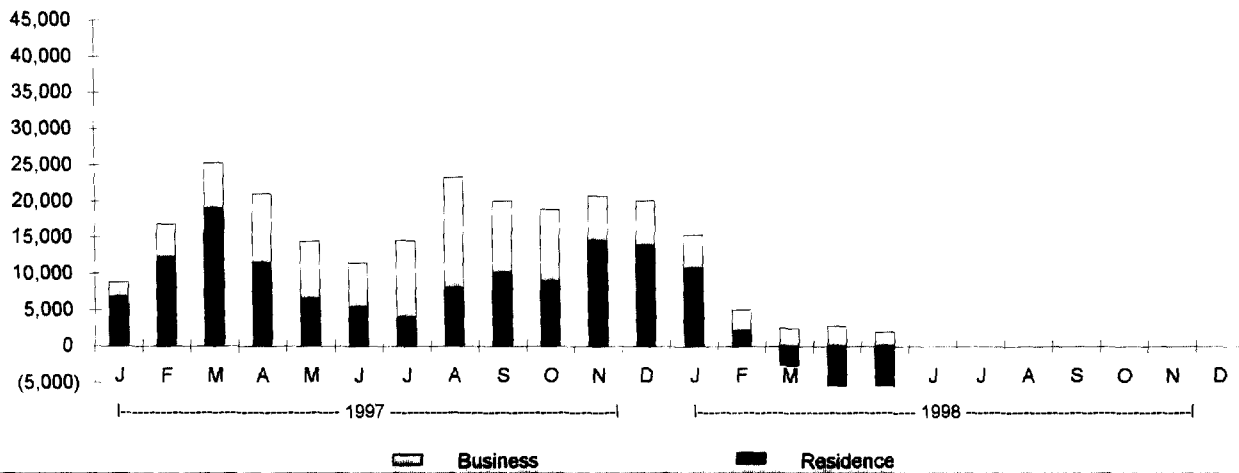


# SBC Resold Lines - Monthly Resale Lines Lost to CLECs

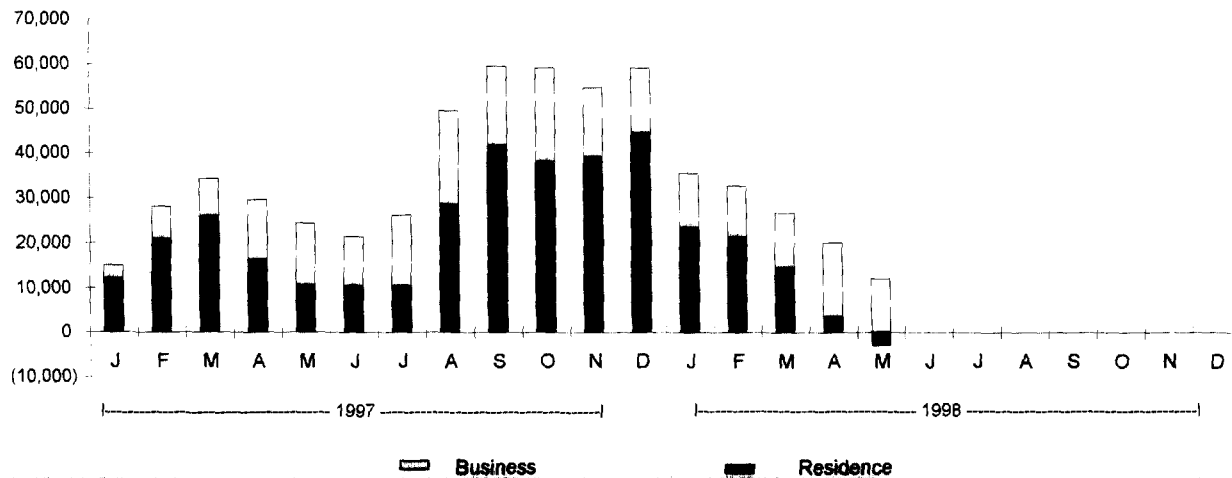
Southwestern Bell Telephone



Pacific Bell



SBC Consolidated



## SBC Resold Lines - Cumulative Resale Lines Lost to CLECs

### Southwestern Bell Telephone

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<b>1998</b>												
Business	76,177	84,587	94,367	107,852	117,972	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Residence	210,457	229,564	246,513	255,456	257,876	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Total	286,634	314,151	340,880	363,308	375,848	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
<b>1997</b>												
Business	2,808	5,342	7,445	11,147	16,950	21,831	26,880	32,539	40,279	51,191	60,425	68,703
Residence	25,366	34,034	40,937	45,783	49,850	54,884	61,404	81,863	113,492	142,650	167,231	197,875
Total	28,174	39,376	48,382	56,930	66,800	76,715	88,284	114,402	153,771	193,841	227,656	266,578
<b>1996</b>												
Business	-	-	-	-	15	65	167	187	212	728	1,328	1,930
Residence	3	74	255	479	1,166	2,250	4,017	6,419	8,161	11,549	15,978	20,096
Total	3	74	255	479	1,181	2,315	4,184	6,606	8,373	12,277	17,306	22,026

### Pacific Bell

<b>1998</b>												
Business	102,092	104,989	107,500	110,354	112,299	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Residence	145,254	147,420	144,848	139,535	134,203	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Total	247,346	252,409	252,348	249,889	246,502	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
<b>1997</b>												
Business	4,510	9,110	15,355	25,013	33,001	39,134	49,796	65,154	75,075	85,114	91,351	97,532
Residence	20,715	32,912	51,904	63,300	69,793	75,178	79,056	87,014	97,151	106,014	120,558	134,436
Total	25,225	42,022	67,259	88,313	102,794	114,312	128,852	152,168	172,226	191,128	211,909	231,968
<b>1996</b>												
Business	-	-	-	83	69	113	188	276	377	577	1,146	2,435
Residence	-	-	-	2	2	27	55	99	833	1,994	7,222	14,012
Total	-	-	-	85	71	140	243	375	1,210	2,571	8,368	16,447

### SBC Consolidated

<b>1998</b>												
Business	178,269	189,576	201,867	218,206	230,271	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Residence	355,711	376,984	391,361	394,991	392,079	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Total	533,980	566,560	593,228	613,197	622,350	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
<b>1997</b>												
Business	7,318	14,452	22,800	36,160	49,951	60,965	76,676	97,693	115,354	136,305	151,776	166,235
Residence	46,081	66,946	92,841	109,083	119,643	130,062	140,460	168,877	210,643	248,664	287,789	332,311
Total	53,399	81,398	115,641	145,243	169,594	191,027	217,136	266,570	325,997	384,969	439,565	498,546
<b>1996</b>												
Business	-	-	-	83	84	178	355	463	589	1,305	2,474	4,365
Residence	3	74	255	481	1,168	2,277	4,072	6,518	8,994	13,543	23,200	34,108
Total	3	74	255	564	1,252	2,455	4,427	6,981	9,583	14,848	25,674	38,473

## SBC Resold Lines - Monthly Resale Lines Lost to CLECs

### Southwestern Bell Telephone

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<b>1998</b>												
Business	7,474	8,410	9,780	13,485	10,120	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Residence	12,582	19,107	16,949	8,943	2,420	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Total	20,056	27,517	26,729	22,428	12,540	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
<b>1997</b>												
Business	878	2,534	2,103	3,702	5,803	4,881	5,049	5,659	7,740	10,912	9,234	8,278
Residence	5,270	8,668	6,903	4,846	4,067	5,034	6,520	20,459	31,629	29,158	24,581	30,644
Total	6,148	11,202	9,006	8,548	9,870	9,915	11,569	26,118	39,369	40,070	33,815	38,922
<b>1996</b>												
Business	-	-	-	-	15	50	102	20	25	516	600	602
Residence	3	71	181	224	687	1,084	1,767	2,402	1,742	3,388	4,429	4,118
Total	3	71	181	224	702	1,134	1,869	2,422	1,767	3,904	5,029	4,720

### Pacific Bell

<b>1998</b>												
Business	4,560	2,897	2,511	2,854	1,945	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Residence	10,818	2,166	(2,572)	(5,313)	(5,332)	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Total	15,378	5,063	(61)	(2,459)	(3,387)	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
<b>1997</b>												
Business	2,075	4,600	6,245	9,658	7,988	6,133	10,662	15,358	9,921	10,039	6,237	6,181
Residence	6,703	12,197	18,992	11,396	6,493	5,385	3,878	7,958	10,137	8,863	14,544	13,878
Total	8,778	16,797	25,237	21,054	14,481	11,518	14,540	23,316	20,058	18,902	20,781	20,059
<b>1996</b>												
Business	-	-	-	83	(14)	44	75	88	101	200	569	1,289
Residence	-	-	-	2	-	25	28	44	734	1,161	5,228	6,790
Total	-	-	-	85	(14)	69	103	132	835	1,361	5,797	8,079

### SBC Consolidated

<b>1998</b>												
Business	12,034	11,307	12,291	16,339	12,065	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Residence	23,400	21,273	14,377	3,630	(2,912)	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Total	35,434	32,580	26,668	19,969	9,153	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
<b>1997</b>												
Business	2,953	7,134	8,348	13,360	13,791	11,014	15,711	21,017	17,661	20,951	15,471	14,459
Residence	11,973	20,865	25,895	16,242	10,560	10,419	10,398	28,417	41,766	38,021	39,125	44,522
Total	14,926	27,999	34,243	29,602	24,351	21,433	26,109	49,434	59,427	58,972	54,596	58,981
<b>1996</b>												
Business	-	-	-	83	1	94	177	108	126	716	1,169	1,891
Residence	3	71	181	226	687	1,109	1,795	2,446	2,476	4,549	9,657	10,908
Total	3	71	181	309	688	1,203	1,972	2,554	2,602	5,265	10,826	12,799